

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
Irving H. Picard
David J. Sheehan
Seanna R. Brown
Heather R. Wlodek

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**CERTIFICATE OF NO OBJECTION TO APPLICATIONS FOR
INTERIM COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF ACTUAL AND NECESSARY EXPENSES INCURRED
BY APPLICANTS FROM APRIL 1, 2021 THROUGH JULY 31, 2021**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll
and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his

undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On November 3, 2021, the Trustee filed the Applications for Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred by Applicants from April 1, 2021 through July 31, 2021 (the "Fee Applications"). These Fee Applications include the following:

- A. Thirty-Seventh Application of Trustee and Baker & Hostetler LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2021 through July 31, 2021 for Baker & Hostetler, L.L.P., Trustee's Attorney, period: 4/1/2021 to 7/31/2021, fee: \$32,623,262.19, expenses: \$559,259.11. (Filed: 11/3/2021) [ECF No. 20833]
- B. Thirty-Sixth Application of Windels Marx Lane & Mittendorf, LLP for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2021 through July 31, 2021 for Windels Marx Lane & Mittendorf, LLP, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$1,610,141.50, expenses: \$9,663.04. (Filed: 11/3/2021) [ECF No. 20834]
- C. Thirty-Second Application of Young Conaway Stargatt & Taylor, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Actual and Necessary Expenses Incurred from April 1, 2021 through July 31, 2021 for Young Conaway Stargatt & Taylor, LLP, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$85,902.80, expenses: \$1,162.81 (Filed: 11/3/2021) [ECF No. 20835]
- D. Application of Browne Jacobson, LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2021 through July 31, 2021 for Browne Jacobson, LLP, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$116,597.26, expenses: \$11,262.96 (Filed: 11/3/2021) [ECF No. 20836]
- E. Application of Soroker Agmon Nordman as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2021 through July 31, 2021 for Soroker Agmon Nordman, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$1,362,703.62, expenses: \$71,982.64 (Filed: 11/3/2021) [ECF No. 20837]
- F. Application of Schiltz & Schiltz As Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses

Incurred from April 1, 2021 through July 31, 2021 for Schiltz & Schiltz, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$79,008.53, expenses: \$5,135.55 (Filed: 11/3/2021) [ECF No. 20838]

- G. Application of Graf Isola Rechtsanwlte GMBH as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2021 through July 31, 2021 for Graf Isola Rechtsanwlte GMBH, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$177,207.11, expenses: \$13,796.57 (Filed: 11/3/2021) [ECF No. 20839]
- H. Application of UGGC & Associs as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from March 1, 2021 through July 31, 2021 for UGGC & Associes, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$84,047.94, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20840]
- I. Application of Eugene F. Collins as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2021 through July 31, 2021 for Eugene F. Collins, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$20,070.21, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20841]
- J. Twelfth Application of Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2021 through July 31, 2021 for Robbins, Russell, Englert, Orseck, Untereiner & Sauber LLP, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$4,351.05, expenses: \$78.55 (Filed: 11/3/2021) [ECF No. 20842]
- K. Twelfth Application of The Scaletta Law Firm, PLLC as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2021 through July 31, 2021 for The Scaletta Law Firm, PLLC, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$19,584.18, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20843]
- L. Fifteenth Application of Kelley, Wolter & Scott, Professional Association as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2021 through July 31, 2021 for Kelley, Wolter & Scott, Professional Association, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$2,000.00, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20844]
- M. Application of Monfrini Bitton Klein as Special Counsel to the Trustee for Allowance of Interim Compensation for Services and Reimbursement of Expenses Incurred Rendered from April 1, 2021 through July 31, 2021 for Monfrini Bitton Klein, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$43,302.37, expenses: \$110.73 (Filed: 11/3/2021) [ECF No. 20845]

- N. Final Application of Soffer Avocats as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered and Reimbursement of Expenses Incurred from April 1, 2021 through July 31, 2021 and for Release of Fees Previously Held Back for Soffer Avocats, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$35,322.54, expenses: \$143.50 (Filed: 11/3/2021) [ECF No. 20846]
- O. Application of Travers Thorp Alberga as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 26, 2021 through July 31, 2021 for Travers Thorp Alberga, Special Counsel, period: 4/26/2021 to 7/31/2021, fee: \$14,013.00, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20847]
- P. Application of Velitor Law as Special Counsel to the Trustee for Allowance of Interim Compensation for Services Rendered from April 1, 2021 through July 31, 2021 for Velitor Law, Special Counsel, period: 4/1/2021 to 7/31/2021, fee: \$36,223.20, expenses: \$0.00 (Filed: 11/3/2021) [ECF No. 20848]
2. The deadline for filing objections to the Fee Applications expired on December 1, 2021 at 4:00 p.m. A hearing on the Fee Applications has been scheduled for December 15, 2021 at 10:00 a.m.
3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv'r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-1789 (SMB), ECF No. 4560) (the "Notice Order"), notice of hearing on the Fee Applications was provided by U.S. Mail postage prepaid or email to: (i) all parties included in the Master Service List as defined in the Notice Order; (ii) all parties that filed a notice of appearance in this case; (iii) the SEC; (iv) the IRS; (v) the Acting United States Attorney for the Southern District of New York; and (vi) SIPC.
4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Fee Applications appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Fee Applications.

5. An electronic copy of the proposed order (the “Order”) that is substantially in the form of the proposed order that was annexed to the Fee Applications will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: December 3, 2021
New York, New York

By: /s/ David J. Sheehan
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Tel: (212) 589-4200
Fax: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Seanna R. Brown
Email: sbrown@bakerlaw.com
Heather R. Wlodek
Email: hwlodek@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
the Chapter 7 Estate of Bernard L. Madoff*